

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

HARRIETT MENEZES,

Plaintiff,

V.

ASSOCIATION OF FLIGHT ATTENDANTS-
CWA, AFL-CIO, et al.,

Defendants.

Civil Case No. 04-10365-JLT
Judge Tauro

**MOTION OF THE ASSOCIATION OF FLIGHT ATTENDANTS
AND INDIVIDUAL DEFENDANTS PATRICIA FRIEND,
PAUL MACKINNON, SUE COOK, KAREN SCOPA, SHIRLEY BARBER,
AND MARIA TORRE FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT AND
CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.2**

Defendants, the Association of Flight Attendants (“AFA” or “the Union”) and individual defendants Patricia Friend, Paul Mac Kinnon, Sue Cook, Karen Scopa, Shirley Barber and Maria Torre respectfully request that this Court grant a seventeen (17) day extension of time to answer or otherwise respond to plaintiff’s complaint. In support of this motion, defendants provide the following:

1. Defendant Karen Scopa was served with plaintiff's complaint on August 4, 2004. Therefore, her answer or response to the complaint is due on August 24, 2004.
2. On August 9, 2004, AFA and defendants Patricia Friend, Paul Mac Kinnon, Shirley Barber and Maria Torre accepted personal service of the complaint from the United States Marshall Service. Therefore, the answer or response of AFA and the aforementioned individuals is due on August 29, 2004.

3. Named defendant Sue Cook has not been served with the complaint.

4. Due to the press of business and scheduled business travel by AFA lead counsel, Edward J. Gilmartin, during the week of August 22, 2004, as well as a long-planned vacation coinciding with the Labor Day weekend, AFA and the aforementioned individual defendants respectfully request an extension of time until September 10, 2004, to answer or otherwise respond to the complaint.

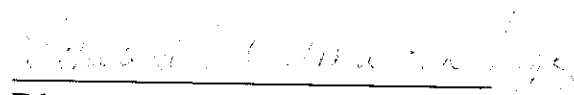
5. Undersigned counsel for defendants has contacted plaintiff Harriet Menezes, who is representing herself *pro se*, to discuss the request for extension of time. After AFA's counsel left a message on her answering machine indicating his desire for an extension of time, Ms. Menezes, in turn, responded with a voice mail message to counsel stating that "it would not be in her best interest" to agree to an extension of time for AFA and the individual defendants to answer or otherwise respond to the complaint.

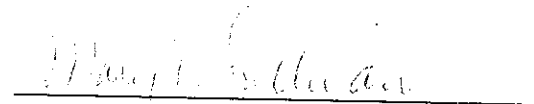
6. This is the aforementioned defendants' first request for an extension of time, and they do not anticipate making any additional requests for extension of time.

Based upon the foregoing, AFA and the individual defendants respectfully request that the Court grant their request for an extension of time until September 10, 2004, to answer or otherwise respond to the complaint.

Date: August 23, 2004

Respectfully submitted,


Edward J. Gilmartin, Esq.
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Attorneys for AFA, Patricia Friend, Paul
Mac Kinnon, Sue Cook, Karen Scopa,
Shirley Barber, and Maria Torre

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion for Extension of Time has been served upon the Plaintiff, Harriett Menezes, 169 Thoreau Street, Apt. 8, Concord, MA 01742 by first class mail this 23rd day of August, 2004.


Mary T. Sullivan